IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Application of:
    Cragun et al.

Serial No.: 10/600,382

Confirmation No.: 8521

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Filed: June 20, 2003

Group Art Unit: 2165

Examiner: Michael J. Hicks

For: HETEROGENEOUS MULTI-LEVEL EXTENDABLE INDEXING FOR GENERAL PURPOSE ANNOTATION SYSTEMS

MAIL STOP APPEAL BRIEF - PATENTS
Commissioner for Patents
P.O. Box 1450
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November 18, 2009   /Tammi Thomas/ Date   Tammi Thomas

Dear Sir:

REPLY BRIEF

Applicants submit this Reply Brief to the Board of Patent Appeals in response to the Examiner's answer dated September 18, 2009.

While Applicants maintain each of the arguments submitted in Applicants' previously submitted Appeal Brief, Aplicants make the following further arguments in light of the Examiner's Answer.

Applicants' remarks/arguments begin on page 2 of this paper.

ARGUMENTS

The Combination of *Chatterjee* and *Dobrowski* does not render any of Claims 10, 13-14, 22 and 28 under 35 U.S.C. § 103(a)

The Examiner continues to suggest that a technique using metadata describing multimedia content in a web-page to enhance text-based search results of the web-page (*Chatterjee*) in view of techniques for managing industrial process data related to chemical and petroleum plants (*Dobrowski*) renders the present claims obvious. Respectfully, Applicants disagree.

As demonstrated in Applicants' Appeal Brief, the combination of *Chatterjee* and *Dobrowski* does not teach, show, or even suggest the method recited by claim 10 for "managing annotations for a plurality of different type data objects" that includes "creating an index for the annotated data object by mapping the identifying parameters to columns in an index table, as specified by the mapping functions of the selected mapping."

> Nevertheless, the Examiner suggests:
>
> [*Chatterjee* discloses] creating an index for the annotated data object by mapping the identifying parameters to columns in an index table, as specified by the mapping functions of the selected mapping, (*Chatterjee* et al., column 1, lines 38-40; column 6, lines 44-51).

Final Office Action, p. 5. However, the passages cited by the Examiner do not disclose an index being created "for the annotated data object <u>by mapping the identifying parameters to columns in an index table</u>" whether "as specified by the mapping functions of the selected mapping" or not. Instead, the Examiner cites passages from *Chatterjee* that describe metadata associated with a multimedia object in a web page being embedded in that webpage.

> For example, the passage at *Chatterjee* 6:44-51 provides as follows:
>
> The metadata extracted from the content of the media data is appended at 42 to the metadata previously obtained from other sources, including the markup tags which identified the media data, from system directories, and from other sources, such as keyboarded input accepted from a human

editor and supplied in response to automatically generated prompts generated during the course of the annotation process.

Chatterjee 6:44-51. Plainly, the processing of appending metadata extracted from a media file (e.g., metadata naming the artist and track name for an MP3 file) to other metadata in no way describes an index created <u>by mapping the identifying parameters to columns in an index table</u>, as claimed. The passage cited by the Examiner goes on to clearly state that the metadata extracted from a media file is simply added to the web page where the media file was found:

> In accordance with the invention, <u>the combined metadata describing each of the various multimedia resources which are incorporated into the Web page being scanned are represented in text (character-based) form and inserted into the Web page to enhance its content as seen at 46 in FIG. 2</u>. These inserted text annotations may advantageously conform to both the XML specification and to the Resource Description Framework (RDF) Model and Syntax Specification, a World Wide Web Consortium (W3C) Recommendation (available at http://www.w3.org/TR/REC-rdf-syntax). The RDF Recommendation introduces a model for representing metadata as well as a syntax for encoding this metadata in a manner that maximizes the interoperability of independently developed Web servers and clients. RDF uses the Extensible Markup Language XML and specifies semantics for data based on XML in a standardized, interoperable manner.

Chatterjee, 6:52-67. Put simply, *Chatterjee* does not teach, show, or even suggest the claimed step of "creating an index for the annotated data object by mapping the identifying parameters to columns in an index table, as specified by the mapping functions of the selected mapping, as suggested by the Examiner." Instead, *Chatterjee* teaches that metadata describing multimedia in a web page may be embedded back in the web page itself. That is, *Chatterjee* makes the unremarkable observation that metadata describing multimedia content in a web page may be obtained from different sources, e.g., the file itself (a file name, or an ID3 tag in an MP3 file) or a from a person who manually tags the file – a user typing in the name of a song and once so obtained, stored in the same webpage using well known metadata formats (e.g., XML and RDF).

Finally, claims 10 and 28 also require that "the mapping functions of at least one of the mappings <u>maps more than one identifying parameter to a single column</u>." The Examiner concedes that the metadata-embedding system disclosed in *Chatterjee* does not disclose this limitation, but turns to *Dobrowski*. Specifically, the Examiner suggests:

Dobrowski et al. does teach wherein the mapping functions of at least one of the mappings maps more than one identifying parameter to a single column (.Dobrowski et al.; figure 4, column 8, lines 44-47).

Examiner's Answer p. 4. However, as demonstrated in Applicants' Appeal Brief, the passage cited by the Examiner teaches that devices in an industrial process system may be characterized by a number of parameters. And the particular example in Figure 4 "shows a list of parameters describing Rosemount 1151 Rev. 6 type of devices, such as AC/DC, Deadband Mix, etc., which describe this type of devices in an import file specified by a user." *Dobowski*, 8:67 – 9:3. At the same time, Applicants continue to believe nothing in these passages describing the parameters from an "import file" discloses a mapping function that "maps more than one identifying parameter to a single column" in an index table," as recited by claims 10 and 28.

Accordingly, for all the foregoing reasons, Applicants submit that the examiner has failed to demonstrate that the claims 10 and 28 are obvious in view of the combination of *Chatterjee* and *Dobowski*. Therefore, Applicant respectfully request that the board vacate the rejection of these claims, as well as the rejection of dependent claims 13, 14, and 22.

CONCLUSION

The Examiner errs in finding that claims 10, 13-14, 22 and 28 are unpatentable over *Chatterjee* in view of *Dobrowski* under 35 U.S.C. § 103(a).

Withdrawal of the rejections and allowance of all claims is respectfully requested.

Respectfully submitted, and
S-signed pursuant to 37 CFR 1.4,

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